

P 562339332

File 144899



Illinois Environmental Protection Agency : P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 1631210004 -- St. Clair
Clayton Chemical
ILD066918327
Log 1990-335 (1990-096)
RCRA Permit File

July 23, 1990

Clayton Chemical Company
Attention: Edward Reidy, Jr.
1 Mobil Avenue
Sauget, Illinois 62201

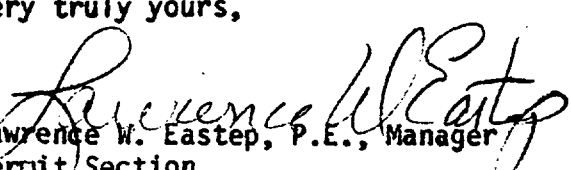
Gentlemen:

The Agency hereby approves the operation of equipment necessary to disperse hazardous solids into a liquid hazardous waste fuel. This equipment includes a dispersing blender and its associated piping.

The dispersing grinder is authorized for development only and shall not be operated until an operating permit has been issued by this Agency.

If you have any further questions please contact Ted Dragovich of my staff at 217/782-6762.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:TD:jk/2650n,11

000000

SCREENED BF



217/782-6762

Refer to: 1631210004 -- St. Clair
Clayton Chemical
ILD066918327
Permit #1979-19-OP
Log #1990-335 (1990-096, 1986-20, 625B; 1982-2-OP; 1982-39-SP;
1982-2-BE (10/19/81, 12/29/81, 2/16/82, 2/17/82); 1979-19-OP
(9/17/81); 1980-516 (5/6/80); 1979-19-OP (2/19/80); 1979-19-OPX
(11/5/79); 1979-19-DE (7/20/79))

March 13, 1980
Revised July 23, 1990

Clayton Chemical Company
Attention: Edward J. Reidy, Jr.
1 Hobil Avenue
Sauget, Illinois 62201

Gentlemen:

Permit is hereby granted to the above facility to operate a solid waste management site to store, process, blend for supplemental fuels or reclaim spent solvents and oils consisting of the following:

4.41 acres in Township 2 North, Range 10 West, Third PM in Lot 304 of the Cahokia Commons, St. Clair County, Illinois.

Final plans specifications, application and supporting documents as submitted and approved shall constitute part of this permit and are identified on the records of the Illinois Environmental Protection Agency, Division of Land Pollution Control by the permit numbers and log numbers designated in the heading above.

The permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This permit allows Clayton Chemical to operate the following units:

a. Tank Storage

<u>Tank Designation</u>	<u>Volume per Tanks (gals)</u>	<u>Usage</u>
T-2	5,515	Fuel Oil Storage
T-3	5,515	Fuel Oil Storage
T-7	5,515	Waste Solvent Storage
T-9	5,515	Waste Solvent Storage
T-11	27,500	Waste Oil Storage

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<u>Tank Designation</u>	<u>Volume per Tanks (gals)</u>	<u>Usage</u>
T-12	27,500	Waste Oil Storage
T-13	27,500	Waste Oil Storage
T-14	27,500	Waste Oil Storage
T-16	10,900	Product Oil Storage
T-17	7,000	Product Oil Storage
T-18	3,800	Product Oil Storage
T-20	23,328	Product Oil Storage
T-27	4,600	Waste Solvent Storage
T-28	1,900	Waste Solvent Storage
T-29	10,000	Product Solvent Storage
T-33	5,000	Product Solvent Storage
T-34	5,000	Product Solvent Storage
T-36	11,163	Product Oil Storage
T-37	5,000	Product Oil Storage
T-38	5,000	Product Oil Storage
T-40	5,000	Product Oil Storage
T-41	5,000	Product Oil Storage
T-42	5,000	Product Oil Storage
T-43	6,000	Product Oil Storage
T-44	6,000	Product Solvent Storage
T-45	3,000	Product Solvent Storage
T-46	3,000	Product Solvent Storage
T-47	3,000	Product Solvent Storage
T-201	3,336	Waste Oil Storage
T-202	3,336	Waste Oil Storage
T-203	5,040	Waste Oil Storage
T-204	5,040	Waste Oil Storage
T-205	10,000	Waste Oil Storage
T-206	10,000	Waste Oil Storage
T-207	10,000	Waste Oil Storage
T-208	10,000	Waste Oil Storage
T-209	10,000	Waste Oil Storage
T-210	10,000	Waste Oil Storage
T-211	10,000	Waste Oil Storage
G-2	61,655	Oil Processing Tank
G-3	290,000	Oil Processing Tank
G-4	200,000	Oil Processing Tank
G-5	200,000	Oil Processing Tank
G-6	27,500	Oil Processing Tank
G-7	27,500	Oil Processing Tank
G-8	27,500	Oil Processing Tank
G-9	27,500	Oil Processing Tank
G-10	27,500	Oil Processing Tank
G-11	27,500	Oil Processing Tank
R-1	27,500	Supplemental Fuel Storage
S-1	10,000	Waste Solvent Storage
S-2	10,000	Waste Solvent Storage
S-3	10,000	Waste Solvent Storage

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<u>Tank Designation</u>	<u>Volume per Tanks (gals)</u>	<u>Usage</u>
S-4	10,000	Waste Solvent Storage
S-5	10,000	Product Solvent Storage
S-6	10,000	Product Solvent Storage
S-7	10,000	Product Solvent Storage
S-8	10,000	Product Solvent Storage

b. Container Storage

<u>Tank Designation</u>	<u>Size</u>	<u>Usage</u>
Drum Storage Area 1	1000 drums/ 55 gallons	Oil storage and pumping area

c. Processing Units

1. 6 -- distillation columns
2. hot oil heaters
3. 4 industrial boilers (1-Reliance, 1-PB, 2-Kewanee) with fuel storage tanks
4. Dispersing blender with sealable lid, nitrogen blanket system, and explosion proof motor
5. Dispersing grinder which is capable of reducing the particle size of all processed waste to 1/8 inch or less. (This unit must receive an operating permit prior to operation.)

d. All corresponding sumps, pumps, filters, piping controls, loading and unloading areas and appurtenances.

2. Waste solvents and oils received for treatment/reclaiming or blending into supplemental fuels shall be limited to:

a. Solvents

halogenated solvents
trichloroethylene
tetrachloroethylene
1,1,1, trichloroethene
methylene chloride

non-halogenated solvents
mineral spirits
glycol ether
hexane
heavy naphtha
decane

non-halogenated aromatics
toluene
xylene
benzene
ethyl benzene

ketones
acetone
MEK
cyclohexanone
MIBK

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alcohol
methanol
ethanol
butanol
propanol
isopropanol
propoxyethanol
2-ethyl-1-hexanol

esters
ethyl acetate
butyl acetate
isopropyl acetate
propyl acetate
isobutyl acetate
methyl cellosolve acetate
cellosolve acetate
butyl formate
methyl methacrylate

ethers
ethyl ether

b. Oils

1. diesel fuel
2. metal work fluids
3. hydraulic fluids
4. automotive oils
5. railroad engine oils
6. industrial oil
7. gear lubricants

3. Tanks 201-211 shall store only the following oils:

- a. lubricating oils
- b. hydraulic oils
- c. cutting oils
- d. crankcase draining oils

4. The following shall not be stored in tanks 201-211:

- a. chlorinated solvents and cleaning fluids
- b. metal working fluids
- c. electrical insulating and transformer oils

5. Drums of liquid special waste shall be stacked a maximum of 2 high.

6. Drums of solid special waste shall be stacked a maximum of 2 high.

7. Flammable waste and flammable materials shall be stored according to existing State Fire Prevention regulations.

8. All loading, unloading of special waste shall be accomplished over spill containment devices. A spill containment device shall be capable of containing spillage in the immediate area and following expeditious removal of spilled waste.

000034



Page 5

9. This facility shall be operated in accordance with this Agency's Division of Water and Air Pollution Control Permits.
10. Special waste received at this site for recovery shall be transported to the facility utilizing the Agency's supplemental permit or generic permit system and manifest system.
11. Oils contaminated with PCB's (at concentrations greater than 10 parts per million) or dioxins are not permitted under this permit.
12. Special wastes generated at the site for disposal, storage, incineration or further treatment elsewhere shall be transported to the receiving facility utilizing the Agency's supplemental permit system and manifest system.
13. This permit is subject to review and modification by the Agency as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act, and all applicable environmental rules and regulations.
14. Any modification to the facility shall be the subject of an application for supplemental permit for site modification submitted to this Agency.
15. Permittee shall notify the Agency of any changes from the information submitted to the Agency in its application for a developmental and operating permit for this site. Permittee shall notify the Agency of any changes in the names or addresses of both beneficial and legal titleholders to the herein-permitted site. Such notification shall be made in writing within fifteen (15) days of such change and shall include the name or names of any parties in interest and the address of their place of abode; or, if a corporation, the name and address of its registered agent.
16. All containers must be stored in a manor which allows inspection of each container in accordance with 35 IAC 725.274.
17. No waste may be accepted for full blending which has a heat value less than 5000 BTU/lb.
18. Annual Thickness Testing and a thorough initial internal tank inspection in accordance with API Publication, Guide For Inspection of Equipment, Chapter VIII, "Atmospheric and low-pressure storage tanks" must be conducted on each tank prior to the storage of each of the following wastes:

K028, K029, K030, K048, K049, K050, K095, K096, U055, U057, U118, U162, F005.

000035

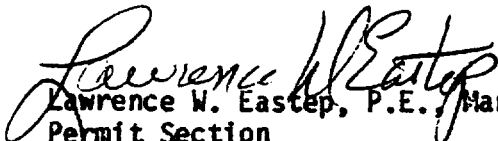


An independent Illinois registered professional engineer must certify the results of the internal inspection. The results of the thickness testing and the results of previous thickness testing must be compiled in a format which allows the Agency to compare the results for each tank by year to determine the amount corrosion has effected the shell thickness of the tank. The results of the inspection along with previous thickness testing results must be submitted to the Agency prior to introducing the new waste stream into the tank. If the initial internal inspection reveals non uniform corrosion occurring within the tank a second internal inspection must be conducted within one year of the initial internal inspection and the results used to calculate the life expectancy of the tank. The life expectancy of the tank must be calculated by determining the rate of corrosion for each tank in mil/yr and calculating the time required for corrosion to reduce the shell thickness to less than the design thickness of the tank.

An internal inspection must be conducted annually when the life expectancy of a tank is calculated to be less than five years or annual thickness testing indicates a corrosion rate greater than 5 mil/yr.

19. Upon completion of the installation of the dispersing grinder, the operator must make application to the Agency to operate this unit and a pre-operation inspection will be scheduled with our Collinsville FOS Office. Operation of this unit shall not commence until the facility receives an operating permit for this unit.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:TD:jk/2650n,12-17

cc: Division File
Southern Region
Compliance
Division of Water Pollution Control
Division of Air Pollution Control

000833

PERMIT LOG NO. : 1990/335
NAME : CLAYTON CHEMICAL COMPANY
OWNER :

STATUS : I
SITE NO. : 1631210004

COUNTY : ST CLAIRE

CITY : SAUGET

PERMIT TYPE : SUP

REVIEWER : TJD

ILITY TYPE : STPR

WASTE TYPE :

RECEIVED : 90/06/25 DUE: 90/09/23

MAILED : 90/07/24

FINAL ACTION : ISSUED

WAIVER :

CLOSURE PLAN SUBM'T:

FINAN. ASSUR. SUBM'T:

REG. POLL. CONTROL:

SITING APP'D:

NOTIFY APC:

NOTIFY PWS:

NOTIFY WPC:

CROPA:

NOTIFY ENF: Y

NOTIFY CMS: Y

NOTIFY LOCAL OFFICIALS: Y

NOTIFY FOS: Y

NOTIFY DOT :

NOTIFY AGRI:

NOTIFY ISGS:

NOTIFY CONSER.:

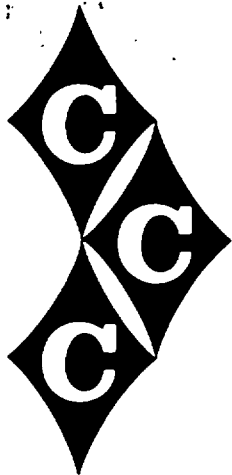
NOTIFY DELEGATED COUNTY:

NOTIFY DENR:

PRE-OF MEMO SENT:

MENTS:

0000337



Clayton Chemical Co.

June 21, 1990

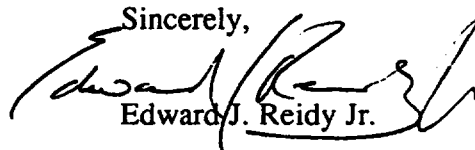
Ted Dragovich
Illinois EPA/DLPC
2200 Churchill Rd
P.O. Box 19276
Springfield, IL 62794-9276

Dear Ted,

Enclosed is the Permit application to operate the dispersing grinder for which authorization to develop such equipment was granted on May 29, 1990. The unit was inspected on Monday, June 18, 1990 by Steve Noblitt and Jeff Schulenbacher and no apparent problems were indicated.

Please contact me with any questions or comments regarding this permit application. Your prompt attention to this matter is greatly appreciated.

Sincerely,



Edward J. Reidy Jr.

RECEIVED

JUN 25 1990

IEPA-DLPC

000000

II SECTION REPORT

TYPE OF FACILITY

TYPE OF INSPECTION

NON-REGULATED STATUS

PART A

PART B PERMIT APPLICATION

ENFORCEMENT

TSD FACILITY ACTIVITY SUMMARY[illegible]

SUMMARY OF APPARENT VIOLATIONS

OWNER

OPERATOR

Name <i>CLAYTON CHEMICAL COMPANY</i>	Name <i>SAME AS OWNER</i>
Address <i>77 MOBILE AVE.</i>	Address
City <i>SAUGET</i>	City
State <i>IL</i> Zip <i>62201</i>	State Zip
Phone # <i>618/271-0467</i>	Phone #

PERSON(S) INTERVIEWED

TITLE

PHONE #

[illegible]

INSPECTION PARTICIPANT(S)

AGENCY/TITLE

PHONE #

STEVE NEZLITT	EPS: 1 / IEPA	10/0-345-5120
JEFF SCHENBACHER	EPS: 1 / IEPA	"

PREPARED BY

AGENCY/TITLE

PHONE #

STEVE NOBLITT	EPA/EPS-1	611/246-5120
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[illegible][illegible][illegible]

Clayton Chemical Company
1631210004 - St. Clair County
ILD066918327

REMARKS

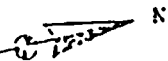
Clayton Chemical Company applied for a supplemental permit in February, 1990 for purposes of expanding the list of acceptable waste codes and development of an additional fuel blending process. In conjunction with a follow-up to the April 27, 1990 CEI, an inspection to examine the newly installed fuel blending unit was conducted on June 18, 1990 at the request of Ed Reidy, Clayton Vice President. For information concerning the follow-up portion of the inspection refer to the June 18, 1990 follow-up inspection report.

According to Mr. Reidy, Clayton's plans are to install two units that will aid in the fuel blending process. A dispersing blender and grinder will break up particles in sludge and semi-solid waste and dissolve them into liquid waste fuel. As of June 18, 1990 the dispersing blender was the only unit to be installed. The blender is lowered directly into drums containing sludge waste and is sealed with a clamping lid. Nitrogen will then be pumped into the drum to create a blanket minimizing the potential for fires, explosions and air emissions. The entire unit is confined to the blending room which has secondary containment. Once the material has been delumped by the blender the material will be added to the blending vat. Mr. Reidy plans to have the dispersion grinder on line later this summer.

The findings of the June 18, 1990 inspection have been supplied to Ted Dragovich, Permit Section, for review.

000341

CP3000



R. R. Tracks

Grate 2

30

BLENDING ROOM

Not In Service

Boiler Room

Comp. Room

Elec. Room

Office 6-135

Boiler

Control Room

2 Stills

Fire Station

Emergency Shower

Filter

Control Room

Hot Oil Heater

Drier

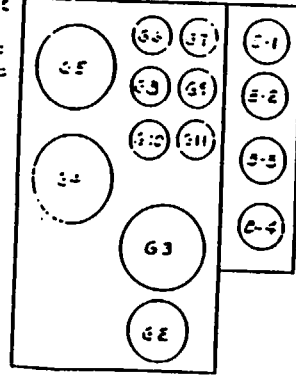
Clean Solvent Dock

Grate 1
Overflow Point

Employee Room

Office Trailer

Water Pit



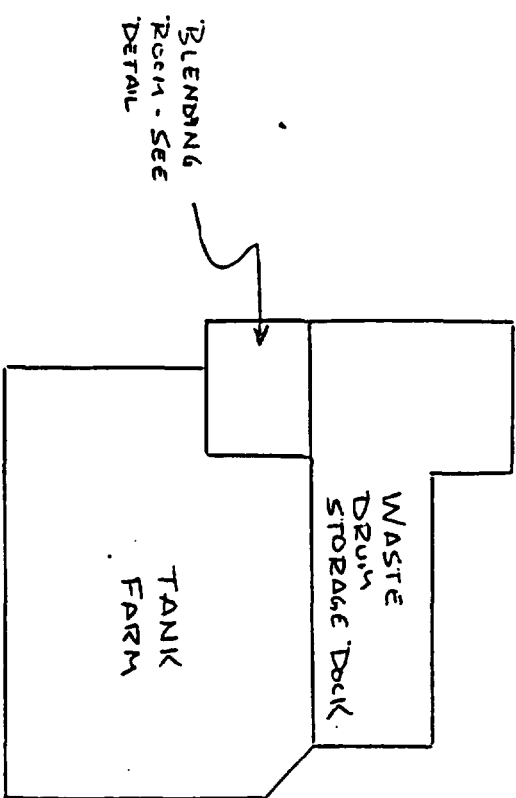
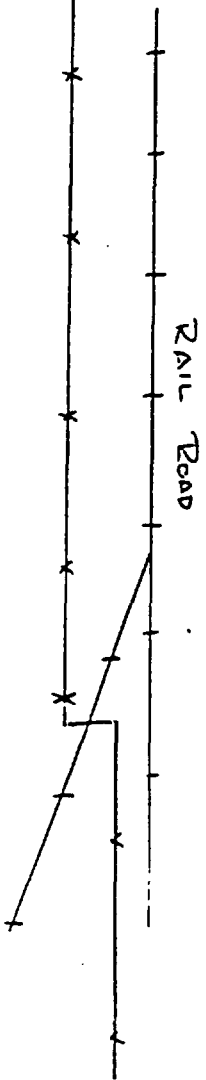
Warehouse

850'

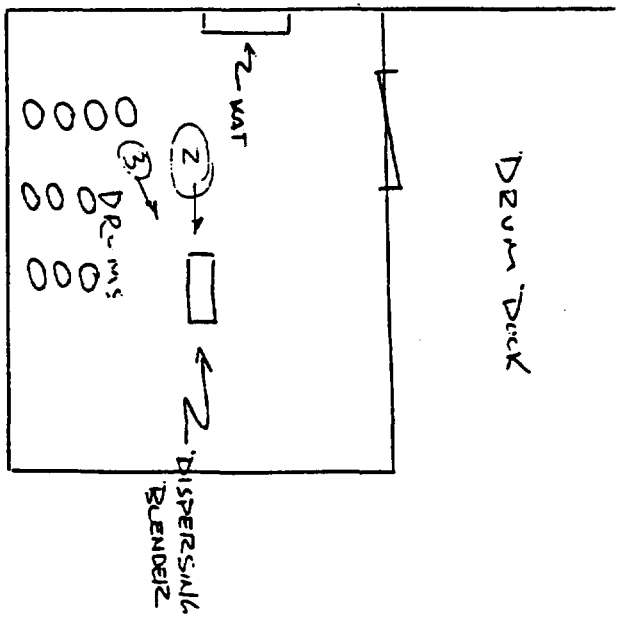
CLAYTON CHEMICAL COMPANY

Site Plot Plan

Date: 10-96



N



BLENDING ROOM

CLAYTON CHEMICAL BLENDING ROOM

000843

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357
ADM 39
054-002

Subject Clayton Chemical

Data _____

Reviewed by TJD

Date _____

Original copy of permit application was delivered to the Agency by hand on 6-21-90. It was misplaced prior to log in and receipt by the reviewer. A FAX copy was received on 7/23/90.

The field inspection indicated the dispersing blender has been installed but the dispersing grinder had not. OP will be issued for the blender but not the grinder.

000344

JUL 23 1990 10:15 CLAYTON



Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

General Application for Permit (LPC-PA1)

This form must be used for any application for permit from the Division of Land Pollution Control, except for waste stream permits and permits for the composting of landscape waste only. Attach any necessary plans, specifications, reports, etc. to fully support and describe the activities or modifications being proposed. If necessary, attach sufficient information to demonstrate compliance with all applicable RCRA requirements.

SITE IDENTIFICATION

Name: CLAYTON CHEMICAL COMPANY Site # (IEPA): 1 6 3 1 2 1 0 0 0 4
 City: SAUGET County: ST. CLAIR
 Existing DE/OP Permit Nos. (if applicable): LOG # 1990-096 PERMIT # 1979-19-C8

OWNER

OPERATOR

Name: CLAYTON CHEMICAL COMPANY SAME
 Address: #1 MOBILE AVENUE
SAUGET, IL 62201
 Contact Name: _____
 Phone: _____

TYPE SUBMISSION:

TYPE FACILITY:

TYPE WASTE:

Developmental	_____	Landfill	_____	General Municipal Refuse	_____
Operating	<u>X</u>	Lans Treatment	_____	Hazardous	<u>X</u>
Supplemental	_____	Transfer Station	_____	Special (Non-Hazardous)	<u>X</u>
Permit Transfer	_____	Treatment	_____	Demo Debris (ex. putrescible)	_____
Name Change	_____	Storage	<u>X</u>	Demo Debris (incl. putrescible)	_____
Closure/Post Closure	_____	Incinerator	_____	Used Oil	<u>X</u>
Certification	_____	Composting	_____	Solvents	<u>X</u>
		Recycling/Reclamation	<u>X</u>	Landscape/Yard Waste	_____
		Other	_____	Other (Specify _____)	_____

DESCRIPTION OF PROJECT: (Include a brief narrative description here.)

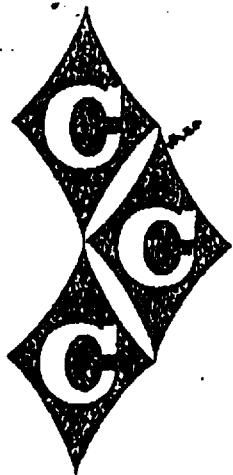
THIS PROJECT CONSISTS SIMPLY OF THE OPERATION OF THE DISPERSING GRINDER FOR
WHICH A DEVELOPMENT PERMIT HAS BEEN ISSUED.

COMPLETENESS REQUIREMENTS

The following items must be submitted unless they are either not required, or have previously been approved. Any items marked "N/A" must be fully explained. For example, a treatment facility may indicate "N/A" for prior conduct certification and explain that certification is not required for treatment facilities. Please refer to the instructions for further guidance.

Have all public notice letters been mailed and is documentation enclosed? X Yes _____ No _____ N/A

This Agency is authorized to require this information under Ill. Rev. Stat., 1979, Chapter 111 1/2 Section 1039. Disclosure of this information is required and failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.



Clayton Chemical Co.

Ted Dragovich
Illinois EPA/DLPC
2200 Churchill Rd
P.O. Box 19276
Springfield, IL 62794-9276

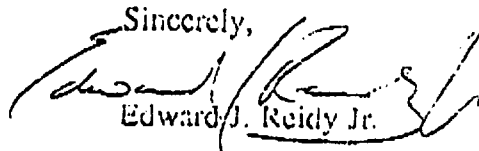
June 21, 1990

Dear Ted,

Enclosed is the Permit application to operate the dispersing grinder for which authorization to develop such equipment was granted on May 29, 1990. The unit was inspected on Monday, June 18, 1990 by Steve Noblitt and Jeff Schulenbacher and no apparent problems were indicated.

Please contact me with any questions or comments regarding this permit application. Your prompt attention to this matter is greatly appreciated.

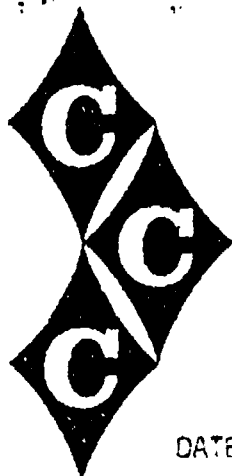
Sincerely,



Edward J. Reidy Jr.

000043

JUL 23 1990 10:14 CLAYTON



Clayton Chemical Co.

Facsimile: 618-271-9521

**** FAX TRANSMITTAL ****

DATE: 7/23

TO: EPA

ATTN: TED DRABOWICH

RE: PERMIT APPLICATION / SHAR

MESSAGE: _____

TED -

I will send Along
Another copy in the Mail.

-ED

No. of Subsequent Pages 4

000047

Page 2

- 2.a. Is the Siting Certification Form (LPC-PAB) completed and enclosed? Yes ☐ No ☒ N/A
- b. Is siting approval currently under litigation? Yes ☐ No ☒ N/A
3. Is a closure, and if necessary a post closure, plan covering these activities being submitted, or has one already been approved? (Provide permit number _____.) Yes ☐ No ☒ N/A
4. Are financial assurance documents being submitted? Yes ☐ No ☒ N/A
5. Is a request for prior conduct certification for the chief operator being submitted, or is the chief operator currently certified? (Provide OC # _____ and date of certification ____/____/____.) Yes ☐ No ☒ N/A
- 6.a. Is land ownership held in beneficial trust? Yes ☐ No ☒ N/A
- b. If yes, is a beneficial trust certification form (LPC-PA9) completed and enclosed? Yes ☐ No ☒ N/A

SIGNATURES

All applications shall be signed by the person designated below or by a duly authorized representative of that person:

- Corporation - By a principal executive officer of at least the level of vice-president.
Partnership or Sole Proprietorship - By a general partner or the proprietor, respectively.
Government - By either a principal executive officer or a ranking elected official.

A person is a duly authorized representative only if:

- the authorization is made in writing by a person described above; and
- is submitted with this application (a copy of a previously submitted authorization can be used).

I hereby affirm that all information contained in this Application is true and accurate to the best of my knowledge and belief.

Owner Signature: _____

Title: _____

Edward J. Baskin
Vice President

6/24/90
(Date)

Operator Signature: _____

Title: _____

(Date)

Engineer Signature: _____

Engineer Name: _____

Engineer Address: _____

(Date)
Engineer Seal:

Engineer Phone No.: _____

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Agency rules and guidelines.

LWE:tk:5/11/49-6(10/25/89)



Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

Honorable Kenneth Hall
327 Missouri Ave. Room 422
East St. Louis, IL 62201

Date: June 21, 1990

To Elected Officials and Concerned Citizens:

The purpose of this notice is to inform you that a permit application has been submitted to the IEPA, Division of Land Pollution Control, for a solid waste project described below. You are not obligated to respond to this notice, however, if you have any comments, please submit them in writing to the address below, or call the Permit Section at 217/782-5762, within twenty-one (21) days.

Illinois Environmental Protection Agency
Permit Section, Division of Land Pollution Control (#24)
2200 Churchill Road, P.O. Box 19276
Springfield, IL 62794-9276

The permit application, which is identified below, is for a project described at the bottom of this page.

SITE IDENTIFICATION

Site Name: CLAYTON CHEMICAL COMPANY

Site # (IEPA): 1 6 3 1 2 1 0 0 0 0

Address: #1 MOBILE AVENUE

City: SAUGEY

County: ST. CLAIR

TYPE PERMIT SUBMISSION:

Development
Operating X
Supplemental
Transfer
Name Change
Waste Stream

TYPE FACILITY:

Landfill
Land Treatment
Transfer Station
Treatment Facility
Storage X
Incinerator
Composting
Recycling/Reclamation X
Other

TYPE WASTE:

General Municipal Refuse
Hazardous X
Special (Non-Hazardous) X
Demo Debris (ex. putrescible)
Demo Debris (incl. putrescible)
Used Oil X
Solvents X
Landscape/Yard Waste
Other (Specify)

DESCRIPTION OF PROJECT: (For multiple waste stream applications, see reverse side.)

This project consists simply of the operation of the dispersing grinder for
which a development permit has been issued.